
EXHIBIT 2

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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**In re: Methyl Tertiary Butyl Ether ("MTBE")
Products Liability Litigation**

This Document Relates To:

City of Fresno, et al.,

Plaintiffs,

v.

Chevron U.S.A. Inc.

Defendants
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MDL No. 1358

**PLAINTIFF'S FIRST SET OF
INTERROGATORIES TO
DEFENDANT
RE PRODUCT IDENTIFICATION**

POUNDING PARTY:

PLAINTIFF CITY OF FRESNO

RESPONDING PARTY:

VALERO REFINING COMPANY - CALIFORNIA

SET:

ONE

Pursuant to Rule 33 of the Federal Rules of Civil Procedure and in accordance with the directive of the Court at the May 11, 2004 status conference, Plaintiffs hereby submits the following First Set of Interrogatories, to be answered separately, in writing, and under oath, by each responding defendant listed on Exhibit A (attached hereto) on or before July 9, 2004. As directed by the Court at the May 11, 2004 status conference, each responding defendant's answers to these Interrogatories should include a description of the specific steps undertaken by the defendant to obtain the information contained in such answers. This First Set of Interrogatories is served without prejudice to Plaintiffs right to seek additional discovery.

DEFINITIONS

- A. All definitions contained in Local Rule 26.3 of the United States District Court for the Southern District of New York are incorporated herein by reference.
- B. **MTBE** means methyl tertiary butyl ether.
- C. **MTBE Product** means any petroleum product containing MTBE. With respect to gasoline containing MTBE, MTBE Product includes any and all of the following: conventional gasoline containing MTBE, winter oxygenate fuel containing MTBE, and/or reformulated gasoline containing MTBE; provided, however, that if any responding defendant claims that it is unable to determine whether any conventional gasoline contained MTBE for purposes of answering these Interrogatories, MTBE Product shall include any and all conventional gasoline.
- D. **Refinery** means a facility used to process crude oil, unfinished oils, natural gas liquids, or other hydrocarbons into any petroleum product.
- E. **Terminal** means a petroleum product storage and distribution facility that is supplied by pipeline, vessel or other means, and from which such petroleum products may be removed at a rack and/or distributed by pipeline, and includes bulk storage and distribution facilities located at Refineries.
- F. **Terminalling Partner** means an entity that leased petroleum product storage or otherwise had the right to store petroleum products in the product storage tanks at a Terminal not owned, operated, or controlled by that entity.
- G. **You** means the responding defendant, its subsidiaries and affiliates.
- H. **Your** means of or pertaining to the responding defendant, its subsidiaries and affiliates.

INTERROGATORIES

1. Please identify the name and address of each entity (including You, if applicable) that supplied You with MTBE Products for ultimate delivery into Kern County at any time since the date of first MTBE use in Kern County, the dates or date ranges when each such entity supplied You with MTBE Products, and the name and address of each Refinery from which such MTBE Products were supplied.

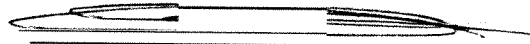
2. Please identify the name and address of each entity from which You obtained neat MTBE for use at any Refinery owned or operated by You that supplied gasoline for ultimate delivery into Kern County, the dates or date ranges when MTBE was acquired from each such supplier, and the name and address of Your Refinery(ies).

3. Please identify each Terminal You use or used to supply gasoline for ultimate delivery into Kern County at any time since the date of first MTBE use in Kern County and the dates or date ranges when You have used such Terminal. For each Terminal You use or used, please also state whether You owned or operated such Terminal or were a Tenninalling Partner at such Terminal.

Dated: Sacramento, California
August 4, 2004

MILLER, AXLINE & SAWYER

By:



DUANE C. MILLER, SBN 57812
MILLER, AXLINE & SAWYER
Attorneys for Plaintiffs
1050 Fulton Avenue, Suite 100
Sacramento, CA 95825
Phone: (916) 488-6688

PROOF OF SERVICE VIA E-MAIL AND US MAIL

I, Christina Hise, hereby declare under penalty of perjury of the law that a true copy of the following:

PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT RE
PRODUCTION IDENTIFICATION
[VALERO REFINING COMPANY - CALIFORNIA]

as served via e-mail, pursuant to Judge Shira A. Schiendlin's Case Management Order dated April 1, 2004 [Section IV], upon:

eter Sacripanti, Esq.
cDermott Will & Emery LLP
sacripanti@mwe.com

Defense Liaison Counsel.

+tan Alpert, Esq.
•ertaweitzlux.com

Plaintiffs' Liaison Counsel.

on the 4th day of August, 2004, and on the following persons or parties by placing a true copy hereof in a sealed envelope, showing the addresses set forth below, for collection and deposit in the United States Postal Service on that date following ordinary business practices:

See Attached List

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct.

Executed on August 4, 2004, at Sacramento, California.


CHRISTINA HISE

ohn J. Wasilczyk, Esq.
 llison N. Shue, Esq.
 avid L. Schrader
 ichael T. Zarro, Esq.
 organ Lewis & Bockius
 00 South Grand Avenue, 22nd Floor
 os Angeles, CA 90071-3132

Counsel for Chevron USA, Inc.; Texaco,
 Inc.; ChevronTexaco Corporation; Chevron
 Environmental Services Company

ojoon Hwang, Esq.
 arin S. Schwartz, Esq.
 unger, Tolles & Olson
 3 New Montgomery Street, 19th Floor
 an Francisco, CA 94105-9781

Counsel for Shell Oil Company; Texaco
 Refining & Marketing, Inc.; Equilon
 Enterprises LLC

illiam D. Temko, Esq.
 uger, Tolles & Olson
 55 Grand Avenue, 35th Floor
 os Angeles, CA 90071-1560

Counsel for Shell Oil Company, Equilon
 Enterprises LC, Equiva Services LLC, and
 Texaco Refining & Marketing, Inc.

olleen P. Doyle, Esq.
 iana Pfeffer Martin, Esq.
 atherine M. Stites, Esq.
 ingham McCutchen LLP
 55 South Grand Avenue, Suite 4400
 os Angeles, CA 90071-1560

Counsel for Exxon Corporation; Exxon
 Mobil Corporation

on D. Anderson, Esq.
 ichele Johnson, Esq.
 atham & Watkins
 50 Town Center Drive, Suite 2000
 osta Mesa, CA 92626

Counsel for Tosco Corporation;
 ConocoPhillips Corporation

rendan M. Dixon
 nocal Corporation
 76 S. Valencia Avenue
 rea, CA 90245

Counsel for Unocal Corporation; Unocal Oil
 Company of California

rian M. Ledger
 udy R. Perrino
 ordon & Rees LLP
 01 West Broadway, Suite 1600
 an Diego, CA 92101-3541

Counsel for Kern Oil & Refining Company

. Clifford Gunter, III, Esq.
 racie J. Renfroe, Esq.
 RACEWELL & PATTERSON, LLP
 11 Louisiana Street, Suite 2900
 ouston, TX 77002

Counsel for Valero Refining Company-
 California; Ultramar, Inc.

arc M. Seltzer, Esq.
 avid C. Marcus, Esq.
 usman Godfrey LLP
 901 Avenue of the Stars, Ste. 950
 os Angeles, CA 90067

Counsel Arco Chemical Company; Lyondell
 Chemical Company

lan J. Hoffman, Esq.
 ank Rome Comisky & Mccauley, LLP
 ne Logan Square
 8th and Cherry Street
 hiladelphia, PA 19103-6998

Counsel for Arco Chemical Company;
 Lyondell Chemical Company

atthew T. Heartney, Esq.
 awrence Allen Cox, Esq.
 ephanie Michele Bonnett
 mold & Porter
 77 South Figueroa Street, 44th Floor
 os Angeles, CA 90017-5844

Counsel for Atlantic Richfield Company

pencer T. Malysiak, Esq.
 pencer T. Malysiak Law Corporation
 180 Iron Point Road, Ste. 145B
 olsom, CA 95630

Counsel for New West Petroleum; New
 West Petroleum LLC

obert P. Doty, Esq.
 ox, Castle & Nicholson LLP
 55 Montgomery Street, Fifteenth Floor
 an Francisco, CA 94111-2585

Counsel for Duke Energy Merchants LLC;
 Duke Energy Trading and Marketing LLC;
 Duke Energy Merchants California, Inc.;
 Northridge Petroleum Marketing U.S., Inc.

licia Vaz
 ox, Castle & Nicholson LLP
 049 Century Park East
 os Angeles, CA 90067

Counsel for Duke Energy Merchants LLC;
 Duke Energy Trading and Marketing LLC;
 Duke Energy Merchants California, Inc.;
 Northridge Petroleum Marketing U.S., Inc.

effrey L. Fillerup, Esq.
 uce, Forward, Hamilton & Scripps, LLP
 121 Spear Street, Suite 200
 an Francisco, CA 94105-1582

Counsel for Pacific Southwest Trading

eter M. Hart
 right, Robinson, Osthimer & Tatum
 4 Montgomery Street, 18th Floor
 an Francisco, CA 94104-4705

Counsel for Nella Oil Company LLC

quiva Services LLC
 /o Vivian Imperial
 .T. Corporation
 18 W. Seventh Street
 os Angeles, CA 90017

estport Petroleum, Inc
 /o Vivian Imperial
 .T. Corporation
 18 W. Seventh Street
 os Angeles, CA 90017.